

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 6:19-CR-25
	§	JUDGES JDK/JDL
ANDREW MARK HARRIS (06)	§	

**ELEMENTS OF THE OFFENSE**

**Count 1**

VIOLATION:	21 U.S.C. § 846 (Conspiracy to distribute and possess with intent to distribute methamphetamine)
PENALTY:	A fine of not more than \$1,000,000; imprisonment for not more than twenty (20) years; or both. A term of supervised release of at least three (3) years.
MANDATORY ASSESSMENT:	\$100.00.

The Defendant is charged in Count 1 of the Information with conspiracy to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of 21 U.S.C. § 846.

The essential elements which must be proven to establish a violation of this offense are:

**First:** That two or more persons, directly or indirectly, reached an agreement to

commit the offense of distribution of and possession with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, as charged in the Information;

**Second:** That the Defendant knew of the unlawful purpose of the agreement;

**Third:** That the Defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

/s/ Alan R. Jackson

Alan R. Jackson  
Assistant U. S. Attorney  
110 North College St., Suite 700  
Tyler, Texas 75702  
(903) 590-1400  
State Bar No. 10453300  
alan.jackson@usdoj.gov

CERTIFICATE OF SERVICE

On this 15th day of August, 2019, I, Alan R. Jackson, Assistant U. S. Attorney for the Eastern District of Texas, do hereby certify that a true and correct copy of the foregoing instrument has been served on the following according to the Federal Rules of Criminal Procedure and the rules of this Court: Kenneth Hawk, attorney for the Defendant.

/s/ Alan R. Jackson  
ALAN R. JACKSON